

City Public Service

of San Antonio, Texas

September 13, 2001

Mr. Lake H. Barrett, Acting Director
Office of Civilian Radioactive Waste Management
United States Department of Energy
Washington, D.C. 20585

SEP 2 6 2001

Dear Mr. Barrett:

Re: Yucca Mountain Project - Comments of City Public Service of San Antonio, Texas

City Public Service ("CPS") is the provider of electricity in San Antonio, Texas, substantially all of Bexar County, Texas, and small portions of seven adjacent Texas counties. CPS serves over 575,000 electric customers with CPS-owned and operated electric facilities with a net capability of 5,027 MW.

CPS owns a 28% interest in the South Texas Project ("STP"), a two unit, 2500 MW nuclear power plant located in Matagorda County, Texas. Ownership of STP is shared with three other Texas electric utilities. Through July 2001, CPS electric customers have paid more than \$53 million into the Nuclear Waste Fund, and the electric customers of all four owners of STP collectively have paid a total exceeding \$190 million into the Fund. This demonstrates that we have a substantial interest in the timely resolution of spent fuel disposal.

CPS has reviewed the Preliminary Site Suitability Evaluation (the "PSSE") and other scientific documents produced by the Department of Energy and submits the following comments in support of the rapid development of the Yucca Mountain site for a repository for high-level radioactive waste.

The PSSE and other scientific documents produced by the Department of Energy
provide a clear scientific basis for finding that the Yucca Mountain site is suitable for
development of a repository for high-level radioactive waste under the very stringent
and conservative suitability criteria.

- The Secretary of Energy should determine that the scientific evaluations indicate the site is suitable for a repository and recommend the development of the Yucca Mountain site to the President of the United States.
- We do not perceive any reasons to prevent the President of the United States from recommending the Yucca Mountain site as qualified for the preparation and submission of a construction license application to the Nuclear Regulatory Commission.

Sincerely yours,

Jámie A. Rochelle

General Manager and CEO

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cc: Mr. William T. Cottle, President & CEO STP Nuclear Operating Company